



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

JUL 12 2002

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Washington, D.C. 20590

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Indianapolis, Indiana 46204-2965

Ref. No. 02-0170

Dear Mr. Wiseman:

This is in response to your letter requesting clarification under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) as it pertains to the transportation of compressed natural gas (CNG) in bulk packaging. Specifically, your questions are answered as follows:

Q. Can CNG be transported in an MC-331 cargo tank?

A. Unless specifically authorized in the Hazardous Materials Table (§ 172.101) or applicable exemption, a bulk packaging containing CNG must be packaged in accordance with § 173.302(a)(3). As provided by § 173.302(a)(3), only DOT specification 3AX, 3AAX, and 3T cylinders are authorized for bulk shipments of CNG. Thus, MC 331 cargo tank motor vehicles are not authorized for the transportation of CNG under the HMR. Further, as referenced in your letter, § 173.302 (a)(3) specifies conditions that the CNG must meet in order to be transported in DOT specification 3AX, 3AAX, and 3T cylinders. Specifically, the gas must be nonliquefied with a minimum purity of 98 percent methane and commercially free of corroding components. If it is not, specification 3AX, 3AAX, 3T cylinders are not authorized for CNG and must be shipped in the specification containers specified in § 173.302(a)(1).

Q. Can 3AX or 3T cylinders be used to transport methane on public highways if the methane does not have a minimum purity of 98%?

A. As provided in § 173.302(a)(3), the methane must have a minimum purity of 98% and be commercially free of corroding components to be authorized for transportation in DOT specification 3AX, 3AAX, or 3T cylinders.

Q. Has the DOT issued any exemptions to any company allowing compressed natural gas to be transported in bulk commodities in MC-331 cargo tanks or which would allow the transportation of compressed natural gas with a minimum purity of less than 98% methane in 3T cylinders?



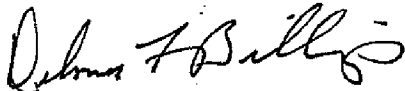
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173.302

A. The answer is yes, the Office of Hazardous Materials Safety previously issued exemptions which allowed the transportation of CNG in MC-331 cargo tank motor vehicles. However, our records show that these exemptions are expired. Further, we have no exemptions which authorize the transportation of CNG in DOT specification 3T cylinders with a purity of less than 98% methane and commercially free of corroding components.

I trust this satisfies your inquiry. Please contact us if we can be of more assistance.

Sincerely,



Delmer Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards

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§ 173.302  
Cylinders  
02-0170

May 30, 2002

Mr. Edward Mazzulo  
Director of Standards  
U.S. Department of Transportation  
400 Seventh Street, S.W., DHM-10  
Washington, DC 20590

Re: Request for Clarification of Hazardous Material  
Regulations

Dear Mr. Mazzulo:

Our firm's client, Marlin Gas Transport, Inc. ("Marlin"), recently spoke with Robert McGuire of the United States Department of Transportation ("DOT") seeking clarification regarding the hazardous material regulations as they pertain to the transportation of compressed natural gas. Mr. McGuire recommended that Marlin seek a written interpretation from the DOT on the following issues.

Question: Can compressed natural gas be transported in bulk commodities in a MC-331 cargo tank?

Relevant Regulations: Pursuant to the hazardous material contained in 49 C.F.R. § 172.101, the transportation of natural gas, compressed, with high methane content (UN1971) is subject to the bulk packaging requirements of 49 C.F.R. § 173.302. 49 C.F.R. § 173.302(a)(3) provides that only 3AX, 3AAX and 3T cylinders are authorized for the transportation of methane. Moreover, this provision states that the methane must have a minimum purity of 98.0% and be commercially free of corroding components in order to be authorized for

transportation in these three types of cylinders. There is seemingly no allowance under § 173.302 or § 173.306 that would allow for the transportation of compressed natural gas in an MC-331 cargo tank.

Question: Can a 3AX or 3T cylinder be used to transport methane on public highways if the methane does not have a minimum purity of 98%?

Relevant Regulations: As noted previously, 49 C.F.R. 173.302(a)(3) defines methane as a non-liquified gas which has a minimum purity of 98% methane and which is commercially free of corroding components. In almost every case, pipeline and wellhead methane will not be able to meet the 98% minimum purity level required by this regulation. Thus, this regulation certainly indicates that these cylinders cannot be used to transport pipeline and wellhead compressed natural gas or methane, although the DOT has previously issued an exemption to certain transporters that would allow the use of the 3AAX cylinder to transport pipeline and wellhead compressed natural gas with the minimum purity of less than 98%. Marlin is not aware, however, of any similar exemptions that would allow for the use of 3AX or 3T cylinders in this situation.

Question: Has the DOT issued any exemptions to any company allowing compressed natural gas to be transported in bulk commodities in MC-331 cargo tanks or which would allow the transportation of compressed natural gas on public highways in 3T cylinders?

Relevant Regulations: 49 C.F.R. § 107.101 allows the DOT to entertain applications for exemptions from certain portion of the hazardous material regulations on a case-by-case basis. We are not aware of any specific exemption that has been issued with respect to the two questions posed above. However, we would like to confirm whether an exemption has ever been issued to allow the transportation of compressed natural gas in bulk quantities in an MC-331 cargo tank or the use of a 3T cylinder for the highway transportation of compressed natural gas with a minimum purity of less than 98%.

If you have any questions with respect to this request for interpretation, please do not hesitate to contact me or my partner

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Norm Garvin. We certainly appreciate the DOT's assistance in helping us better understand the regulations as they pertain to the transportation of compressed natural gas.

Very truly yours,

*Tim W. Wiseman*

Timothy W. Wiseman

TWW/sf

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